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**From:** Louis Nelms [lrnelms@cassblue.com]  
**Sent:** 7/28/2020 1:48:42 PM  
**To:** Miller, Robert [Miller.Robert@epa.gov]  
**CC:** Wheeler, Andrew [wheeler.andrew@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]; Dunn, Alexandra [dunn.alexandra@epa.gov]  
**Subject:** Dicamba Incident Report from Illinois  
**Attachments:** Louis Nelms 1.pdf; Dicamba 2020, Nelms.pdf

Dear Mr. Miller:

I am submitting a pesticide incident complaint I filed with the Illinois Department of Agriculture (IDOA) this month regarding damage to plants on my property resulting from volatilized dicamba. An inspector from IDOA visited my property and confirmed the damage and likely cause -- volatilized dicamba from unidentified sources. The investigator encouraged me to send my report to EPA.

As EPA reviews the re-registration of over-the-top products of dicamba I hope that you consider the evidence I provide. As I stated in my complaint to IDOA, this is the fourth consecutive year OTT dicamba applied to dicamba tolerant soybeans has caused damage to our native landscape plantings and vegetable garden.

In 2018 when I filed my previous complaint to IDOA for dicamba damage, ours was the only complaint registered by IDOA from Mason County where we reside. This was quite interesting because every non-dicamba soybean field I saw in Mason County showed cupping symptoms from dicamba over the entire fields -- obvious patterns of volatilized dicamba. This exemplifies a huge under reporting and under representation of off-target damage caused by the great geographical extent of dicamba application, volatilization and atmospheric loading. Which Bayer continues to deny, beyond any reach of credulity.

The science of OTT dicamba products is clear: there is no effective means of regulating these products and amending product labels to reduce the harms caused by the volatilization of herbicides, toxic at very low levels in the atmosphere, like dicamba. It is rather ludicrous and irresponsible that EPA re-registered these products in 2018 after millions of acres of soybeans were damaged in 2017, allowing the acreage of dicamba tolerant beans to grow substantially and cause greater off-target damage in 2019 and 2020.

The second re-registration process of these problematic products (acknowledged by EPA by its two-year registrations) should be opened for public comment. And the information that EPA required of the product registrants -- on off-target damages and of the volumes of products used -- should be open and transparent for public review.

I sincerely request that EPA consider my complaint in its decision of re-registration. I hope that EPA denies the registrants' petitions for re-registration. This is my ask of you.

Thank you.

Respectfully,

Louis R. Nelms Jr.

